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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN CHAMBERLAIN,

Defendant.

Case No. CR 14-316 VC

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE

The parties are jointly requesting that the status conference presently set for February 9, 2015 at 2:00 p.m. be continued to March 9, 2015 at 2:00 p.m.

As the Court is aware, the above captioned matter is a complicated case with voluminous discovery. The parties have been working diligently to resolve the case, but have yet to reach a resolution. The parties believe that additional time would be beneficial to resolving the case as communications have been fruitful thus far. The parties are working diligently to resolve reciprocal discovery issues involving expert forensic examinations that could affect both case preparation and potential resolution. Additionally, the government informed defense counsel today that it had just been informed by the FBI that additional discovery would be forthcoming.

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1 For the above reasons, the parties stipulate there is good cause – taking into account the public
2 interest in the prompt disposition of this case – to exclude the time from February 9, 2015 to March 9,
3 2015 from computation under the Speedy Trial Act, and that failing to exclude that time would
4 unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation
5 of counsel taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).
6 The parties further agree that the ends of justice would be served by excluding the time from February 9,
7 2015 to March 9, 2015 from computation under the Speedy Trial Act and that the need for the exclusion
8 outweighs the best interests of the public and the defendant in a speedy trial.

9 IT IS SO STIPULATED.

10
11 2/5/2015
DATED


/s/
PHILIP KEARNEY
Assistant United States Attorney

12
13 2/5/2015
DATED

2/5/2015
JODI LINKER
Assistant Federal Public Defender

14
15 IT IS SO ORDERED.

16 February 6, 2015
17 DATED


VINCE CHHABRIA
United States District Judge